

BARRY J. PORTMAN
Federal Public Defender
LARA S. VINNARD
Assistant Federal Public Defender
160 West Santa Clara Street, Suite 575
San Jose, CA 95113
Telephone: (408) 291-7753
Counsel for Defendant MEMIJE SANTOS

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 08-00596 JF
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	HEARING AND EXCLUDE TIME;
v.)	{PROPOSED} ORDER
)	
FELICIANO MEMIJE SANTOS,)	
)	
Defendant.)	
_____)	

Defendant and the government, through their respective counsel, hereby stipulate that, subject to the court's approval, the hearing in the above-captioned matter, presently scheduled for Wednesday, October 8, 2008, be continued to Wednesday, October 22, 2008, at 9:00 a.m. The continuance is requested because the defense is continuing to investigate this matter.

The parties further agree that time should be excluded under the Speedy Trial Act because the defense requires time for effective preparation and investigation, and the ends of justice outweigh the defendant's and the public's need for a speedy trial.

Dated: 9/29/08 _____
LARA S. VINNARD
Assistant Federal Public Defender

Dated: 9/29/08 _____
DANIEL KALEBA
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELICIANO MEMIJE-SANTOS,

Defendant.

No. CR 08-00596 JF

**[PROPOSED] ORDER CONTINUING
HEARING AND EXCLUDING TIME**

The parties have jointly requested a continuance of the hearing set for October 8, 2008, to allow time for the defense to complete investigation.

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date presently set for October 8, 2008, be continued to October 22, 2008, at 9:00 a.m.

Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from October 8, 2008, be continued to October 22, 2008, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

Dated: 10/2/08


JEREMY FOGEL
United States District Judge